



City of Wilmington
2010-2011 Fair Housing Action Plan

Developed from the
Updated Analysis of
Impediments to Fair Housing Choice
June 2010

I. Background

As part of the Consolidated Plan grantees are required to certify that they will Affirmatively Further Fair Housing (AFFH). Compliance with this certification requires the city to conduct an analysis of impediments to fair housing choice within the jurisdiction. Furthermore, the city is required to identify and implement appropriate actions to address or eliminate identified impediments, and to maintain records of actions to document AFFH. Towards that end, the city procured the services of Ken Weeden and Associates to assist with the preparation of an analysis of impediments.

A draft of the *Analysis of Impediments to Fair Housing Choice in the City of Wilmington and New Hanover County* was published for public comment on April 2, 2010. In addition, citizens and interested stakeholders had the opportunity to comment at a public hearing held during the April 20, 2010 City Council meeting. A final draft of the Analysis of Impediments, including public comments and reflecting staff recommended changes, was presented to Council at the June 15, 2010 meeting.

II. Impediments

The AI identified the following Impediments to Fair Housing Choice in the City of Wilmington:

A. Lack of affordable housing, specifically for disabled and low-income populations

Service providers report that demand exceeds the supply of accessible, subsidized units for disabled individuals. The lack of affordable rental housing, especially for elderly, disabled and other special populations is well documented, by the Consolidated Plan, and practitioners. The 3,500 families on the Wilmington Housing Authority Section 8 waiting list are one indication of the need for affordable rental housing.

B. Lack of fair housing enforcement by a local agency or department

Currently, the City of Wilmington and New Hanover County do not have a fair housing department or agency to receive complaints, or promote education and outreach. Lack of effective enforcement is a potential barrier to fair housing in the City and County. Without a local presence and efforts of a local fair housing agency it is more difficult to raise awareness of the law and rights granted under the law. Many who are aware of their rights may not be aware of how or where to file a complaint. This lack of a central location for filing complaints and obtaining information about fair housing may constitute a barrier to fair housing. Additionally, a lack of education by both citizens and housing professionals may lead to discrimination or a violation of fair housing laws.

C. Disparity and inequality in lending

Analysis of 2008 HMDA data reveals a disparity in the loan origination patterns and denial rates of minorities and non-minorities in the Wilmington MSA. Despite similar income levels, minorities have a higher rate of denial than non-minorities. The data however is limited in scope and further investigation would be necessary to determine if discrimination is present. Note that

the perception of lending bias, or undue burdens on minorities seeking home loans could be a barrier to fair housing.

III. Actions to Address Impediments

A. Lack of affordable housing, specifically for disabled and low-income populations

Action: Promote the City's Voluntary Density Bonus Program

City staff will continue to identify models from other communities and develop strategies to promote the city's voluntary density bonus program.

Action: Provide CDBG & HOME Funds to Support Affordable Housing

The Annual Action Plan for expenditure of Community Development Block Grant and HOME Investment Partnership funds identifies initiatives for affordable housing development for low and moderate income, including disabled, residents.

Action: Seek Additional Funds for Development of Affordable Housing

City staff will continue to work with New Hanover County staff to explore opportunities for development of affordable housing including reviewing the possibility of forming a HOME Consortium to secure additional funds for affordable housing development to serve residents within the city and county. Also, city community development staff will continue to seek to leverage resources to increase the funds available for the development of affordable housing within the city, such as projects utilizing Low Income Housing Tax Credits (LIHTC).

B. Lack of fair housing enforcement by a local agency or department

Action: Outreach and Education

The city will maintain a prominent webpage providing information about Fair Housing Law and explaining what constitutes discrimination. In addition, brochures and flyers will be developed to provide information on the Fair Housing Act. Two community development staff members will serve as points of contact to ensure the materials are up to date and accurate, and to actively disseminate brochures and flyers throughout the community, especially to the disabled, elderly and minority citizens.

The city will continue to offer home buying classes, which include information on credit, budget and fair housing laws. Further, the city supports nonprofit home buyer counseling and education offered through AMEZ Housing Development Association. Also, the city senior housing financial counselor is a HUD certified housing counselor.

Action: Referral

Included in the outreach and education materials and webpage will be links and specific instructions on how to file a complaint with the state and federal agencies responsible for

processing complaints. Additionally, the community development staff points of contact will be available to assist in making referrals to the appropriate enforcement agencies.

C. Disparity and inequality in lending

Action: Continue Bank Partners in the HOP Program

Area banks partner with the city to provide financing to low and moderate home buyers through the city's Home Opportunities Program (HOP). The city will continue to encourage area banks and realtors to participate in affordable housing initiatives offered by the city and other organizations.

Action: Continue AFFH in all City Support Housing Programs

City housing loan and grant program guidelines require the city, its grantees and/or borrowers to actively engage in affirmatively furthering fair housing, including displaying the equal housing opportunity logo.